

**BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION
STATE OF FLORIDA**

**INQUIRY CONCERNING
JUDGE LINDA D. SCHOONOVER**

CASE NO. SC-14-1647

**JUDGE LINDA D. SCHOONOVER'S FIRST REQUEST FOR PRODUCTION
TO THE JUDICIAL QUALIFICATIONS COMMISSION**

The Honorable Linda D. Schoonover, pursuant to Rule 12 of the FJQCR adopting Florida Rules of Civil Production 1.350, hereby files her First Request for Production of Documents to the Judicial Qualifications Commission ('JQC'). The JQC has thirty days from the date of service within which to respond comply with the Request. The JQC must respond and produce those documents in its possession. When producing documents responsive to this Request, the JQC is to designate those documents, which it is producing in response to this Request.

Pursuant to Florida Rules of Civil Procedure 1.280(5), regarding claims of privilege, for each document responsive to these requests which is withheld under any claim of attorney-client privilege or work product privilege, provide a statement by a person having knowledge setting forth as to each document:

- (a) Name and title of the author(s)
- (b) the name and title to each person to whom the document was addressed;
- (c) The name and title of each person to whom a copy was sent
- (d) The date of the document;
- (e) The number of pages
- (f) A brief description of the nature and subject matter of the document;

(g) the nature of the claimed privilege;

(h) The category or categories of this request to which the document is responsive

(i) The exact location of the original and each copy as of the date of the receipt of this request. Pursuant to rule “ the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection,” Florida rules of Civil Procedure 1.280(5).

DOCUMENTS REQUESTED

- 1.** Provide all written statements of witnesses, which pertain to this matter in possession of the Investigative Panel on date of Notice of Investigation to Judge Linda Schoonover.
- 2.** Provide all transcripts of testimony of witnesses, which pertain to this matter in possession of the Investigative panel on August 28, 2013, June 25, 2014, October 17, 2013, September 2, 2014, dates of Notices of Investigation to Judge Linda Schoonover.
- 3.** Provide all documents (as defined above), which pertain to this matter in possession of the Investigative panel on August 28, 2013, June 25, 2014, October 17, 2013, September 2, 2014, date of Notice of Investigation to Judge Schoonover.

4. Provide all affidavits, which pertain to this matter in possession of the Investigative Panel on August 28, 2013, June 25, 2014, October 17, 2013, September 2, 2014, date of Notice of Investigation to Judge Schoonover.
5. Provide all complaints under oath indicating that Judge Schoonover is guilty of conduct unbecoming a member of the judiciary demonstrating a present unfitness to hold office in possession of the Investigative Panel on August 28, 2013, June 25, 2014, October 17, 2013, September 2, 2014, Date of Notice of Investigation to Judge Schoonover.
6. Provide all complaints under oath indicating that Judge Schoonover has a disability seriously interfering with the performance of the judge's duties, which is or is likely to become permanent in nature in possession of the Investigative Panel on August 28, 2013, June 25, 2014, October 17, 2013, September 2, 2014, date of Notice of Investigation to Judge Schoonover.
7. Provide all written statements of witnesses which pertain to this matter in possession of the investigatory Panel on August 28, 2013, June 25, 2014, October 17, 2013, September 2, 2014, date of Notice of Formal Charges to Judge Schoonover
8. Provide all transcripts of testimony of any witnesses which pertain to this matter in possession of the Investigative Plane on the date of the JQC filed its Notice of Formal charges and Amended Formal Charges against Judge Schoonover.
9. Provide all documents (as defined above) or other materials which pertain to this matter in possession of the Investigative Panel on the date the JQC filed its Notice of Formal Charges against Judge Schoonover

- 10.** Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above), which reflects that the Investigatory Panel voted to submit formal charges to the hearing panel against Judge Schoonover.
- 11.** Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Investigatory Panel voted individually on each and every numbered allegation which appears in the Notice of Investigation served on Judge Schoonover.
- 12.** Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Investigatory Panel voted individually on each and every numbered allegation which appears in the Notice of Formal Charges filed with the Clerk of the Supreme Court in this matter.
- 13.** Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above), which reflects that the Hearing Panel designated Laurie Waldman Ross to serve as Counsel to the Hearing Panel.
- 14.** Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above), which reflects that the Investigative Panel designated Hank Coxe, III, as Special counsel before the Hearing Panel.
- 15.** Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the

Investigatory Panel designated to Hank Coxe, III to prepare appropriate papers and pleadings and the directions to special counsel advising him of the allegations on which the Investigatory Panel found probable cause.

I HEREBY CERTIFY that a true copy of the foregoing was served via email to Henry M. Coxe, III, hmc@bedellfirm.com; Oliver David Barksdale, odb@bedellfirm.com; Ashley W. Green, awg@bedellfirm.com; 101 East Adams Street, Jacksonville, FL 32202 and Michael L. Schneider, General Counsel, (mschneider@floridajqc.com); JQC, P.O. Box 14106, Tallahassee, Florida, 32317 this 11th day of December, 2014.

EISENMENGER, BERRY, BLAUE & PETERS P.A.

/s/ Gregory W. Eisenmenger

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